

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

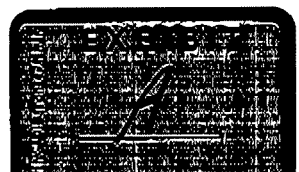
DAVID BILLUPS,	:	Case No. C-1-01-377
Plaintiff,	:	
	:	
v.	:	JUDGE SPIEGEL
	:	MAGISTRATE JUDGE HOGAN
JAMES MCWEENEY, et al.,	:	
Defendants.	:	

AFFIDAVIT OF ED SAUER

STATE OF OHIO)
) ss
COUNTY OF WARREN)

Now comes Ed Sauer, having been first duly sworn, and states and affirms as follows:

1. I am employed by the Ohio Department of Rehabilitation and Correction (ODRC).
 2. I am assigned to Lebanon Correctional Institution (LeCI).
 3. I have been employed there since 1981.
 4. I was a Personnel Officer from March, 2001, to November, 2003.
 5. Since November, 2003, I have been the acting Personnel Officer,
- III.
6. As acting Personnel Officer, III, I am the keeper of all personnel records for current and former employees of the Lebanon Correctional Institution (LeCI).



7. My records indicate that Audrey Young, who had been an Account Clerk supervisor, retired from LeCl on March 28, 2002.

8. Ms. Young had been with LeCl since February 24, 1975, and was a supervisor from 1989 until her retirement.



9. After her retirement, Ms. Young moved from her last known address.

10. The Personnel Office of LeCl cannot pull up any address change of a person after they have left state service. Therefore, any subsequent address for Ms. Young would not be contained in the personnel records of LeCl.

Further affiant sayeth naught.


ED SAUER

Sworn to and subscribed before me this 17th day of December, 2003.


NOTARY PUBLIC
 BEVERLY JO SULSTED
Notary Public - State of Ohio
My Commission Expires
April 14, 2005